Case	1:22-bk-10283-MB Doc 20 Filed 07/12/2 Main Document Pa	
1 2 3 4 5 6 7 8		ANKRUPTCY COURT
9	SAN FERNANDO VALLEY DIVISION	
10		
11	In re:	Case No.: 1:22-bk-10283-MB
12	LUSINE CRISTINE DOKUZYAN,	Chapter 7
13 14	Debtor.	DEBTOR'S OPPOSITION AND MOTION FOR PROTECTIVE ORDER RE: CHAPTER 7 TRUSTEE'S INTENTION
15		TO RELEASE DOCUMENTS [DKT. 18]
16		DECLARATION OF LUSINE DOKUZYAN FILED IN SUPPORT
17		Hearing
18		Date: August 24, 2022 Time: 11:00 a.m. Place: Courtroom 303
19		21041 Burbank Blvd. Woodland Hills, CA 91367
20		See Supplemental Notice of Zoom
21		Hearing Filed Concurrently Herewith
22		
23		
24	TO HONORABLE MARTIN R.	BARASH, U.S. BANKRUPTCY JUDGE;
25	CHAPTER 7 TRUSTEE AMY GOLDMAN;	ALL OTHER PARTIES IN INTEREST:
26	Lusine Dokuzyan ( <u>"Debtor"</u> ) respe	ctfully asks the Court to enter a protective
27	order with respect to the documents	requested by creditor Hovanes Tonoyan
28	("Creditor") from the Chapter 7 Trustee Ar	my Goldman (" <u>Trustee</u> "). The Trustee filed a

"Notice of Chapter 7 Trustee's Intention to Release Documents" ("Trustee's Notice")[Dkt. 18]. Attached as **Exhibit A** is a copy of the Trustee's Notice. The Trustee intends to release, at the request of Creditor, copies of bank statements turned over to the Trustee by the Debtor. This Trustee's Notice was set on "negative notice" and through this Opposition, Debtor requests a hearing be set under LBR9013-1(o)(4), which says if a timely response is received, within 14 days the movant must file a notice of hearing. The Court is asked to set this for hearing on August 24, 2022 at 11:00 a.m.

Debtor does not dispute the turnover of the bank statements per se, but merely to redact the identifying characteristics on the bank statements (i.e. transactions and names money was transferred to). The main reason is because Creditor has been extremely aggressive in his efforts to derail the Debtor's efforts for a fresh start. The Creditor has sent text messages and calls to the Debtor with death threats telling her, Debtor, to go kill herself. Creditor has ruined the Debtor's physical psyche and has caused Debtor to seek protection. The Creditor has contacted nearly all of the Debtor's friends and family members to harass them. Creditor is fixated on knowing every intricate of this Debtor's private life. Creditor sends text messages with varying degrees of threats and outlandish comments. He did so also with Debtor's counsel. See attached as **Exhibit B** for a copy of these text messages.

The Creditor has also been harassing the Chapter 7 Trustee and the Office of the United States Trustee to pursue the Debtor in claims that are unsubstantiated.

The history between the Debtor and Creditor stems from a friendship that turned sour and abusive. Between Debtor and Creditor, the Debtor borrowed or took about \$11,000 to pay a debt for a friend, Felipe, on account of a business debt. This completely upset the Creditor and he went on a rampage to ruin her. Debtor filed this Chapter 7 case for the main purpose of discharging the debt owed to him. Creditor went on to disregard the automatic stay by constantly harassing Debtor. Creditor consistently sent lengthy text messages that included statements about Creditor wanting Debtor to die, telling her how she is not safe, and all her money will be gone

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1	defending herself. Through outrage and malice, Creditor filed a baseless adversary		
2	proceeding on July 6, 2022, which will be subject to a separate motion to dismiss.		
3	With respect to the documents to be released, i.e. the bank statements, the		
4	Debtor begs the Court to allow her, or the Trustee, to redact individual names on the		
5	bank statements of whom the Debtor transferred money to or engaged with. Absent		
6	that, the Creditor will see these names and contact these individuals in an effort to		
7	slander the Debtor and demand payments from these individuals.		
8	The Chapter 7 Trustee has reviewed the names and there exists no cause or		
9	basis to pursue any of the people identified in the bank statements. Therefore, the		
10	Creditor has no reason to see the names of the people the Debtor transferred money to		
11	other than to continue his outlandish quest to ruin this poor girl's life.		
12	Under FRCP 26(c), regarding Protective Orders, the Court has the power to		
13	protect a person from annoyance, embarrassment, oppression or undue burden and		
14	expense. The Court's protective order will not only help the Debtor but also the		
15	individuals and friends of the Debtor identified in the bank statements from considerable		
16	harassment by the Creditor. Again, Debtor does not dispute turnover of the bank		
17	statements but merely to redact the names identified in the descriptions. This limited		
18	redaction is a minor request and will not prejudice the Creditor.		
19	Thus, cause exists to grant this protective request and allow redaction of the		
20	description section and names in the bank statements prior to turnover to the Creditor.		
21			
22	Respectfully submitted,		
23	Dated: July 11, 2022 /s/ Sevan Gorginian		
24	Sevan Gorginian, Esq. Counsel for Debtor		
25			
26			
27			

28

## **DECLARATION OF LUSINE DOKUZYAN**

I, Lusine Dokuzyan, declare as follows:

- I am the debtor in this case. I am over 18 and have personal 1. knowledge of the facts set above. My address is 7635 Bluebell Ave. N. Hollywood, CA 91605. If called as a witness, I could and would competently testify thereto.
- I have known Hovanes Tonoyan for several years and know his 2. behavioral patterns.
  - Hovanes has been extremely hurtful and verbally abusive to me. 3.
  - I filed this bankruptcy case to get rid of a debt that I owed to him. 4.
- Over the last several months he has texted me and called my friends 5. and some family members. He threatens them and tells them that I am a bad person. He uses more vulgar language of course. He wants to tell everyone that knows me of what I allegedly did to him and has made my life very difficult.
- He has made death threats to me and has continually told me to go kill 6. myself and that I am horrible person. But I am not. The text messages that are attached as Exhibit B is a glimpse of the type of harassment we have been subjected to.
- He emailed my bankruptcy attorney with the same verbally abuse 7. language and he just won't stop.
- I do not mind turning over my bank statements that are with the Trustee 8. but I beg the Court to please allow me or the Trustee to redact the names in the bank statements. Otherwise, Hovanes is going to Google them and find their contact information on social media and continue his hatred and cruelty.
- My friends and individuals identified in the bank statements do not deserve that and should be left alone. I ask the Court to please protect their identity from Hovanes finding out their identity.

Lusine Dokuzyan, Declarant

**EXHIBIT A** 

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1 2 3	AMY L. GOLDMAN, Marisol.Jaramillo@lewisbrisbois.com 633 W. 5 <sup>th</sup> Street, Suite 4000 Los Angeles, CA 90071 Telephone: 213.250.1800 Facsimile: 213.250.7900		
4			
5	Chapter 7 Trustee		
6			
7			NAVDA DELGA A GOLADE
8	UNITED STATES BANKRUPTCY COURT		
9	CENTRAL DISTRICT OF CALIFORNIA DIVISION		
10	SAN FERNANDO VALLEY DIVISION		
11	In re		Case No. 1:22-bk-10283-MB
13	Lusine Cristine Doku	zvan	Chapter 7
14	Lusine Cristine Doku	Debtors.	NOTICE OF CHAPTER 7 TRUSTEE'S
15			INTENTION TO RELEASE DOCUMENTS
16			[11 U.S.C. § 704(a)(7)]
17			[No Hearing Required]
18			
19			•
20	TO ALL PARTIES IN INTEREST:		
21	PLEASE TAKE NOTICE that Amy L. Goldman, the Chapter 7 Trustee (the "Trustee")		
22	for the estate of Lusine Cristine Dokuzyan (the "Debtor"), intends to release certain account		
23	statements of the Debtor to Hovanes John Tonoyan, in accordance with 11 U.S.C. § 704(a)(7),		
24	which provides that the Trustee shall: "unless the court orders otherwise, furnish such		
25	information concerning the estate and the estate's administration as is requested by a party in		
26	interest." Specifically, Hovanes John Tonoyan on behalf of himself, has requested copies of all		
27	documents and records produced by the Debtor to the Trustee during the course of the Trustee's		

investigation of the Debtor's assets and liabilities (the "Documents").

28

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1	PLEASE TAKE FURTHER NOTICE THAT the Trustee intends to release the
2	Documents to Hovanes John Tonoyan unless a motion for a protective order is filed within 14
3	days after service of this Notice, and the Bankruptcy Court enters an order prohibiting production
4	of the Documents.
5	
6	Dated: June 29, 2022 /s/ Amy L. Goldman Amy L. Goldman, Chapter 7 Trustee
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 633 W. 5th Street, Suite 4000, Los Angeles, California 90071

A true and correct copy of the foregoing document entitled (specify): NOTICE OF CHAPTER 7 TRUSTEE'S INTENTION TO RELEASE DOCUMENTS will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

- 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On June 29, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:
  - CHAPTER 7 TRUSTEE Amy L Goldman (TR) marisol.jaramillo@lewisbrisbois.com, AGoldman@iq7technology.com;ecf.alert+Goldman@titlexi.com
  - **DEBTOR ATTORNEY Sevan Gorginian** sevan@gorginianlaw.com, 2486@notices.nextchapterbk.com;ani@gorginianlaw.com
  - UNITED STATES TRUSTEE United States Trustee (SV) ustpregion16.wh.ecf@usdoj.gov Service information continued on attached page

## 2. SERVED BY UNITED STATES MAIL:

On June 29, 2022 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

## DEBTOR

Lusine Cristine Dokuzyan

7635 Bluebell Ave.	
North Hollywood, CA 91605	
	Service information continued on attached page
entity served): Pursuant to F.R.Civ.P. 5 following persons and/or entities by perwriting to such service method), by face	LE TRANSMISSION OR EMAIL (state method for each person or 5 and/or controlling LBR, on ( <i>date</i> ) June 29, 2022, I served the resonal delivery, overnight mail service, or (for those who consented in simile transmission and/or email as follows. Listing the judge here delivery on, or overnight mail to, the judge will be completed no later d.
CREDITOR Hovanes John Tonoyan -	Via Email: hoviktonoyan@gmail.com
	Service information continued on attached page
I declare under penalty of perium under	r the laws of the United States that the foregoing is true and correct

I declare under penalty of perjury under the laws of the United States that the foregoing is

June 29, 2022

Marisol Jaramillo

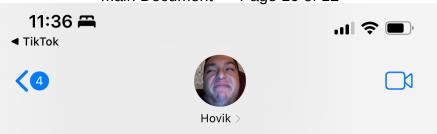
Printed Name

Signature

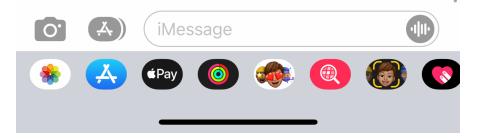
This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

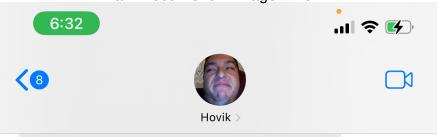
Date

**EXHIBIT B** 

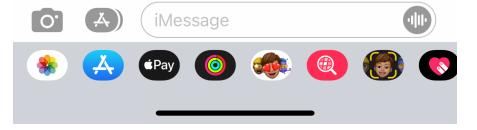


Deling investigated from every corner as we speak. Your mysterious unnamed HUSBAND is not going to cheat me and the rest of your creditors out with you piling out a magic wand making this all go away. You've literally fucked up your life. Next time you have suicidal ideation Luso, text your HUSBAND - don't text me. Oh - and if my PLL senses are getting warmer - what an anti climatic plot twist it'll be if this legal HUSBAND of yours turns out to be none other than your shady business partner, whose name was conveniently left out from all your filings. You literally get what you pay for and your papers all read like the writer had a stroke. Your lawyer isn't going to do anything to me. He has to bill you first before anything and the court will have questions regarding your fraudulent statements before they bother entertaining this circus. It'll be better in the long run if you concentrated all that pent up resentment you have from the years of failed relationships and life goals of yours, against me - because I'm just going to sit back and watch the train wreck unfold while the actual hyenas expose you to REAL LIFE for once. Stay salty sweets.





induced on yourself and literally nothing involving me or of my burden or cause. You could have filed for bankruptcy and then asked me for help instead of fucking my life up and sending some bullshit empty threat over email. Your attorney isn't going to do anything to me. He's not going to file for sanctions, and he isn't going to hold me to account for speaking my mind or expressing the cold hard truth to you. It's going to cost you too much and if you're that heartless to focus your resentment and daddy issues on ME - watch how quick the attorney fees will add up for you the minute he starts holding his hand out asking for you to pay up. Your debts are not going to be discharged. It's actually sad that even despite everything I'm still the one who has to give you the pointers on how to live your life properly but sure, go ahead and ruin it to prove something to me, whatever the fuck that is. But you will not ruin mine, and your attorney can literally shove his diploma mill law degree up his ass. That's coming from your former best friend - not your creditor, sweetie. You may think you'll win this game, but you forget who made the rules. Sleep tight! 😘



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1	PROOF OF SERVICE OF DOCUMENT				
2	I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: <b>450 N. Brand Blvd. Suite 600 Glendale, CA 91203</b>				
3	A true and correct copy of the foregoing document entitled (specify): DEBTOR'S OPPOSITION AND MOTION FOR PROTECTIVE ORDER RE: CHAPTER 7 TRUSTEE'S INTENTION TO RELEASE				
4   5	<b>DOCUMENTS [DKT. 18]</b> will be served or was served <b>(a)</b> on the judge in chambers in the form and manner required by LBR 5005-2(d); and <b>(b)</b> in the manner stated below:				
6	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and				
7	hyperlink to the document. On ( <i>date</i> ) <b>7/11/22</b> , I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:				
8	Amy L Goldman (TR)				
9	marisol.jaramillo@lewisbrisbois.com, AGoldman@iq7technology.com;ecf.alert+Goldman@titlexi.com				
10	Sevan Gorginian on behalf of Debtor Lusine Cristine Dokuzyan sevan@gorginianlaw.com, 2486@notices.nextchapterbk.com;ani@gorginianlaw.com				
11	United States Trustee (SV)				
12	ustpregion16.wh.ecf@usdoj.gov				
13	2. <u>SERVED BY UNITED STATES MAIL</u> : On (date) July 12, 2022 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.				
14 15					
16	PRESIDING JUDGE				
17	Hon. Martin R. Barash U.S. Bankruptcy Court				
18	U.S. Bankruptcy Court 21041 Burbank Blvd. Suite 342 Woodland Hills, CA 91367				
19	<u>Creditor</u> (per address on his complaint filed in the adversary case)				
20	HOVANES JOHN TONOYAN				
	6627 Beeman Avenue North Hollywood, CA 91606				
21	3. <u>SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL</u> (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on				
22	(date), I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as				
23	follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.				
24	I declare under penalty of perjury under the laws of the United States that the foregoing is true and				
25	correct.				
26	Date  Ani Minasyan  Name    Signature   Si				
27	Name Signature				
28					